

Lewis, Jonathan v. Circle K Stores, Inc., et al.

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION
CASE NO. 4:23-cv-01720-JD

JONATHAN LEWIS,
Plaintiff,
vs.
CIRCLE K STORES, INC.,
Defendant.

DEPOSITION OF: NOLAN ALBERT WAPLES
DATE: March 7, 2024
TIME: 11:58 a.m.
LOCATION: Morgan & Morgan
11915 Plaza Drive, Suite 301
Murrells Inlet, South Carolina
TAKEN BY: Counsel for the Plaintiff
REPORTED BY: KAREN M. BECKMAN, CSR

1 about possibly putting a wet floor sign up when we
2 do that kind of thing.

3 Q. Okay. So why did you think of or why
4 did you recommend putting a wet floor sign out when
5 you were doing that type of activity?

6 A. Because of the incident that happened
7 with him.

8 Q. What particular about the incident?

9 A. Just him falling.

10 Q. Was it your understanding that
11 Mr. Lewis had slipped?

12 A. Yes. You could see his visible slip
13 mark on the painted lines.

14 Q. Okay. All right.

15 And then that's why you would have
16 recommended the caution slippery area --

17 A. Correct.

18 Q. -- sign?

19 A. After the fact, yes.

20 Q. Okay. All right.

21 And looking at this report --

22 A. Uh-huh.

23 Q. -- and again I know you haven't seen
24 Plaintiff's Exhibit 4, but if you look at the line
25 items that says Incident Type --

1 A. Yes.

2 Q. -- incident Type Type --

3 A. Yes.

4 Q. Slip, trip, and fall --

5 A. Correct.

6 Q. And again you considered it to be a
7 slip and fall, correct?

8 A. Correct.

9 Q. And it was your understanding or based
10 on what you observed, that Mr. Lewis had indeed
11 slipped on that white stripe that was in front of
12 the Circle K?

13 A. Correct.

14 Q. That area where Mr. Lewis slipped,
15 that's like the main entrance into the store,
16 right?

17 A. Correct.

18 Several people walked through it while
19 it was wet prior to him.

20 Q. Okay. All right.

21 And so why do you bring that up?

22 A. I don't know. I just felt like
23 something to say. I mean, there was several people
24 that walked through there and he slipped. I mean,
25 you know, obviously things happen, but...